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— CITY OF PORTLAND —
ENVIRONMENTAL SERVICES
1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ▪ Dan Saltzman, Commissioner ▪ Dean Marriott, Director

April 28, 2010

Ms. Holly Arrigoni
U.S. Environmental Protection Agency Region 10
1200 S.W. Sixth Avenue, Suite 900 AWT-121
Seattle, WA 98101

Subject: City Comments on the *Final Stormwater Pathway Investigation Work Plan* (March 29, 2010) and the *Video Survey and Line Cleaning Work Plan* (April 2, 2010)
Univar USA, Inc. Portland, Oregon

Dear Ms. Arrigoni:

This letter provides comments from the City of Portland Bureau of Environmental Services (City) to the U.S. Environmental Protection Agency (EPA) on the above referenced documents prepared by PES Environmental, Inc. on behalf of the Univar USA Inc. facility at 3950 NW Yeon Avenue. Stormwater and groundwater discharges from this site have the potential to migrate to the Willamette River via the City's Outfall Basin 18 stormwater conveyance system.

Earlier this year I met with you and the Oregon Department of Environmental Quality (DEQ) to discuss the proposed approach described in the June 2009 draft Stormwater Pathway Investigation (SPI) work plan for this site. Following our meeting, EPA met with Univar representatives and directed Univar to finalize the SPI work plan. The City's primary concern with the final work plan is that data generated using the proposed approach will not support an evaluation of whether contaminants from the Univar site are migrating offsite via the stormwater pathway to Basin 18, delaying the identification and implementation of any necessary source controls. This issue and other concerns with the SPI work plans are discussed in more detail below.

Comments on the *Final Stormwater Pathway Investigation Work Plan*:

1. The City strongly disagrees that the proposed sampling approach will meet the objectives of the Univar SPI. The primary objective of this investigation phase is stated to be an evaluation of whether stormwater runoff from the Univar property is a significant source of contaminants. The work plan does not include characterization of Univar stormwater discharges. Instead, it proposes to conduct an analysis of stormwater contaminant concentrations from two points in the City stormwater conveyance system, above and below Univar connections. If Univar was the only site discharging to this segment of the shared system, this may be appropriate, though contaminant concentrations could be masked by upgradient contributions or diluted by stormwater flow volumes, especially during larger storm events. Univar is not the only site discharging to the shared system between the two points of comparison. In fact, at least six non-Univar stormwater laterals appear to discharge to the system between the proposed upgradient and downgradient sampling locations. Data will not allow for a

technically sound evaluation of Univar contributions to the system and will be inconsistent with the EPA/DEQ Portland Harbor Joint Source Control Strategy approach.

If contaminant concentrations are higher downgradient, it will not be known whether Univar discharges are the source of those constituents. If concentrations are lower downgradient, it will not be known whether concentrations of contaminants in Univar stormwater are acceptable or are being diluted by cleaner discharges from other upgradient sources. Proceeding with this approach will add significant time and cost to the process of evaluating Univar discharges to the shared conveyance system. At a minimum, concurrent stormwater sampling for all site COIs should be conducted at *existing* onsite conveyance system sampling locations (e.g., SWPCP Sampling Points #1 and 3). This would allow for a more direct assessment of whether the site is a source of contaminants via stormwater discharges, and would expedite the proposed second phase of identifying onsite sources.

2. The chemical release and incident history section does not include information relevant to historic releases to the stormwater pathway. In 1996, Van Waters & Rogers (VW&R) was required by DEQ (on behalf of the City) to video the adjacent 42-inch diameter storm sewer as a result of onsite inspection activities that noted severe degradation in the site stormwater system and VOC detections in the storm system line segment adjacent to the site. Samples collected by VW&R as part of the cleaning activities indicated high levels of VOCs in storm system solids (Table 8 in the Workplan includes the data collected by VW&R as part of this response). While data were not collected to identify the source of VOCs in the City storm system, the VW&R site was the suspected source as most detected VOCs matched historic contaminant releases at the site.

   The storm sewer inspection and cleaning of the 42-inch line discussed in Section 4.1 does not link these investigation activities to the suspected site releases that warranted them. Future descriptions of the chemical release and incident history and/or investigation summary sections should acknowledge that based on damage to the onsite stormwater conveyance system from historical releases, actions were taken by VW&R in 1996 to evaluate the structural integrity of the City shared stormwater conveyance system.

3. The scope does not include an assessment of stormwater discharges from Drainage Area #5 to a separate shared stormwater conveyance system west of the site. Rationale for exclusion of this area has not been provided. Do existing site data support that this area is not likely to contain contaminant sources? If so, we would like to have the opportunity to review them. If not, we would appreciate a clear rationale for excluding the area.

4. Under an NPDES permit, Univar discharges remediated groundwater to the 42-inch-diameter shared stormwater conveyance system. If downgradient stormwater sampling occurs during pumped groundwater discharge, stormwater contaminant loading for the site will be masked by these flows. The work plan should address how the dilution effects of site non-stormwater discharges will be mitigated.

5. The preferential pathway evaluation description in Sections 5.4 and 7.4 should include comparison of site groundwater elevations to both onsite and offsite conveyance systems (City and ODOT). Based on the City's understanding of the known contaminated groundwater plume at the site, the preferential groundwater to stormwater pathway to the storm system west of Drainage Area #5 should also be evaluated.
6. Section 6.4 identifies PCBs as a site COI, but indicates that a limited congener list will be reported and identifies an incorrect analytical method. EPA 8082 is utilized for PCB Aroclor analysis while EPA 1668a is utilized for congener analysis. All 209 congeners should be reported to allow for a comparison of concentrations to both individual congener screening level values (SLVs) and to total PCBs SLVs. Text and tables should be revised to reflect this change.
7. More information is needed on the timing of upgradient and downgradient sample collection and on the planned comparison of upgradient and downgradient concentrations. For example, consideration should be given to capturing first-flush discharges from the Univar site and to whether upgradient and downgradient samples will be comparable if they represent different portions of the storm hydrograph.
8. The stormwater sampling and analysis plan references an Anchor/Integral field sampling plan (FSP) utilized for characterizing stormwater discharges to Portland Harbor from a number of drainage basins. Several components of that plan were found to be unworkable during the course of data collection, including some of the sampler programming for collection of flow-paced samples. Field sampling reports were generated for Round 3A and 3B activities conducted by Anchor/Integral on behalf of the Lower Willamette Group. Information in these reports may be of use in refining the technical approach to sample collection.
9. Flow data collection is proposed from the City system for the duration of the 2010/11 storm season (vs. during storm events to pace samplers) to evaluate dry-weather flows. Portable flow meters do not have a high degree of accuracy and without frequent maintenance and data quality review, do not necessarily generate useful information. Standard operating procedures in Appendix C should be amended to include how data will be collected and reviewed to ensure that data quality meets work plan objectives.
10. Sections 8.3 and 8.4 do not identify the correct target sampling period (October 2010 to April 2011).
11. The description of proposed sediment trap work indicates that samples will be processed in a manner that deviates from the method utilized by the referenced Anchor/Integral protocol. What is the rationale for utilizing gravity filtration rather than the recommended pumping method to extract water from sediment trap samples?
12. The report indicates that obstructions will be placed in the 42-inch line to channel flow over installed traps. Before the City grants access to this line for equipment installation, technical details of the trap installation will need to be submitted and reviewed to ensure that the collection system will not be damaged and that obstructions will not compromise storm sewer function.

13. A formal request for access to the City system is required to initiate the development of a sewer system access agreement. The agreement will be structured to cover proposed sampling, line cleaning, and video survey activities referenced in this report and the companion *Video Survey and Line Cleaning Work Plan* (April 2, 2010). The Public Records Request form necessary to initiate this process is available at http://www.portlandonline.com/auditor. The form should identify the specific manholes and line segments that will be accessed, a proposed schedule for access, intended duration of access, and a description of activities that will be conducted within the system. When issued, the access agreement will reference the appropriate approved work plans describing relevant portions of this work.
14. We are uncertain about the reasons analytical priorities differ for proposed water and solids analyses. In stormwater, chlorinated pesticides should be a higher priority given the detections in site surface soils.
15. Proposed solids method reporting limits for organochlorine pesticides exceed relevant screening level values; these should be revised.
16. Future work plans should consider delineation of drainage basins for each point of disposal. The rationale for delineating drainage areas in Figure 3 is not clear, as some areas appear to have a variety of industrial activities and discharge points.
17. Figure 4 presents documented solvent release areas. To help evaluate discharges to the stormwater pathway from contaminated soils and contaminated groundwater, future reports should include figures presenting locations of observed COIs in surface soil and the lateral extent of known groundwater contamination in relation to subsurface utilities.

Comments on the *Draft Video Survey and Line Cleaning Work Plan*:

1. The work plan text and Figure 2 do not clearly identify the City and ODOT line segments slated to be surveyed and cleaned. Based on the descriptions and segment length, it is assumed that the work will include the segment of 42-inch-diameter line between SPI Sampling Point #1 and SPI Sampling Point #2. Clarification of the manholes and line segments being proposed for access will be needed in order for the City to issue an access agreement for the work.
2. To meet the stated objective of evaluating the groundwater pathway, will video survey work include the ODOT stormwater conveyance system along the NW Yeon Avenue Frontage Road? This line discharges to the river at Outfall 18 and based on the City's understanding of the known groundwater plume, this line could be subject to contaminated groundwater infiltration. The work plan should be revised clarify whether the video survey will extend beyond SPI Sampling Point #2.
3. The City has assigned identification numbers to manholes on known conveyance systems in this area. For future reference, SPI Sampling Point #1 is also known as manhole AAX261; SPI Sampling Point #2 is also known as manhole AAT557. Conveyance system information is also available at www.portlandmaps.com.

4. A formal request for access must be submitted to the City to initiate the development of an access agreement. As a request has not yet been received, commencement of work in April is not possible, and completion of work in May could be difficult. The proposed schedule for completion of the baseline survey, cleaning, and post-cleaning video survey will need to be reviewed and approved by the City.

The City anticipates that a second phase of work will be needed at the Univar site to characterize and evaluate discharges to the Willamette River via the stormwater pathway. Thank you for consideration of these comments and for including the City in the work plan review process.

Sincerely,

Linda Scheffler
Water Resources Program Manager
Portland Harbor Superfund

cc: Karen Tarnow/DEQ
Kristine Koch/EPA
Rick Applegate/City of Portland
George Sylvester/Univar
Matthew Dahl/PES Environmental